

HOWARD & HOWARD ATTORNEYS PLLC
 3800 Howard Hughes Pkwy., Suite 1000
 Las Vegas, NV 89169
 (702) 257-1483

Wade B. Gochmour, Esq.
 Nevada Bar No. 6314
Howard & Howard Attorneys PLLC
 3800 Howard Hughes Pkwy., Suite 1000
 Las Vegas, NV 89169
 Telephone: (702) 257-1483
 Facsimile: (702) 567-1568
 E-mail: wbg@h2law.com

Associated with

Keith Fleischman, Esq.
 Fleischman Law Firm
 565 Fifth Avenue, 7th Floor
 New York, NY 10017
 Telephone: (212) 880-9567
 E-mail: keith@fleischmanlawfirm.com

Brian McManus, Esq.
 Miriam Fisher, Esq.
 Latham & Watkins LLP
 555 Eleventh Street, NW, Suite 1000
 Washington, DC 20004
 Telephone: (202) 637-2173
 E-mail: brian.mcmanus@lw.com
 miriam.fisher@lw.com

*Attorneys for Millennium Drilling Co., Inc.,
 Jonathan Feldman and Patriot Exploration
 Company, LLC*

**UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF NEVADA**

Millennium Drilling Co., Inc., a Delaware
 Corporation,

Plaintiff,

vs.

Beverly House-Meyers Revocable Trust,
 Beverly House-Meyers, Trustee; Grace Mae
 Properties, LLC; Hamrick Trust, Robert H.
 Hamrick and Molly Kay Hamrick, Trustees;
 DOES I through X; and ROES I through X,

Defendants.

Molly Hamrick, Beverly House-Myers, R&M
 Hamrick Family Trust;

Third-Party Plaintiffs,

CASE NO.: 2:12-cv-00462-MMD-CWH
 (Base case)

**UNOPPOSED MOTION TO EXTEND
 DEADLINE TO FILE JOINT PRE-
 TRIAL ORDER**

(First Request)

CASE NO.: 2:13-cv-00078-MMD-CWH
 (Consolidated Case)

1 vs.

2 Jonathan Feldman, Montcalm, LLC, Patriot
3 Exploration Company, LLC, Carter Henson,
4 Jr., Matthew Barnes, Robert Holt, Elizabeth
Holt, and Schain, Leifer, Guralnick,

5 Third-Party Defendants.

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7 Plaintiff, MILLENNIUM DRILLING CO., INC. ("Millennium"), and Third-Party
8 Defendants JONATHAN FELDMAN ("Feldman") and PATRIOT EXPLORATION
9 COMPANY, LLC ("Patriot") (collectively, the "Millennium Parties"), by and through their
10 counsel, hereby move the Court for an Order extending the deadline for the filing of the Pre-
11 Trial Order. The Pre-Trial Order is currently due on February 19, 2016, and the Millennium
12 Parties hereby request that the deadline be extended for an additional 30 days to March 21,
2016.

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14 This request is made due to the shear volume of documents produced in this matter and
15 the complex nature of the claims and defenses involved. Additional time is necessary to allow
16 the parties to work through and determine the undisputed facts, the disputed facts and the
17 disputed issues of law for trial. Further, additional time is necessary to work through and
18 determine the stipulations and objections regarding potential trial exhibits. There is also good
19 cause to extend the deadline due the upcoming Settlement Conference before Magistrate
20 Hoffman. Per the Order Scheduling A Settlement Conference (Dkt. #230), the parties
21 settlement statements are due on March 25. It is anticipated that the settlement statements will
22 contain a significant amount of overlap with the Pre-Trial Order, and the extension will allow
23 the parties to work on both submissions in a more efficient and effective manner.

24 Counsel for the Millennium Parties has consulted with counsel for the Defendants/Third
25 Party Plaintiffs regarding the need and intention to file this motion, and counsel for
26 Defendants/Third Party Plaintiffs affirm that they had no opposition to the motion. For that
27 reason, this motion has been submitted as an unopposed motion.

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1 Therefore, the Millennium Parties hereby request that the deadline to file the Pre-Trial
2 Order be continued from February 19, 2016 to March 21, 2016.

3 **DATED** this 18th day of February 2016.

4 HOWARD & HOWARD ATTORNEYS PLLC

5 /s/ Wade B. Gochmour

6 Wade B. Gochmour, Esq.

7 Nevada Bar No. 6314

8 3800 Howard Hughes Pkwy., Ste. 1000

9 Las Vegas, NV 89169

10 *Attorney for Millennium Drilling Co., Inc.,*

11 *Jonathan Feldman and Patriot Exploration*
12 *Company, LLC*

13 **IT IS SO ORDERED:**

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15 **UNITED STATES DISTRICT COURT JUDGE**

16 **DATED:** February 22, 2016

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CERTIFICATE OF SERVICE

I certify that on this 18th day of February 2016, and according to Fed. R. Civ. P. 5(b), I served, via CM/ECF and/or deposited for mailing in the U.S. Mail, a true and correct copy of the foregoing **UNOPPOSED MOTION TO EXTEND DEADLINE TO FILE JOINT PRE-TRIAL ORDER**, postage prepaid (if necessary) addressed to all parties identified on the Court generated Notice of Electronic Filing.

Brian Terry, Esq.
Thorndal Armstrong Delk Balkenbush & Eisinger
PO Box 2070
Las Vegas, NV 89125
Via CM/ECF

Austin H. England, Esq.
Harris Law Firm, P.C.
5050 West Lovers Lane
Dallas, Texas 75209
Via CM/ECF

Anthony L. Vitullo, Esq.
Fee Smith Sharp & Vitullo, LLP
13155 Noel Road, Suite 1000
Dallas, TX 75240
Via CM/ECF

/s/ Kellie Piet
An employee of Howard & Howard Attorneys PLLC

4832-7166-5454, v. 1

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